

**RICHARD A. HARRIS, ESQ.**

Nevada State Bar No. 505

**JOSHUA R. HARRIS, ESQ.**

Nevada State Bar No. 9580

**RICHARD HARRIS LAW FIRM**

801 S FOURTH ST.

LAS VEGAS NV 89101

Ph: (702) 444-4392

Fax: (702) 444-4455

Email: [josh@richardharrislaw.com](mailto:josh@richardharrislaw.com)

**Attorney for Plaintiff**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

JENAIL H. NEWTON,

Plaintiff,

vs.

COMMISSIONER OF SOCIAL  
SECURITY ADMINISTRATION,

Defendant.

Case No 2:18-cv-00971-GMN-GWF

**FIRST STIPULATION FOR  
EXTENSION OF TIME TO FILE  
REPLY TO RESPONSE TO  
MOTION FOR REMAND**

Comes now Plaintiff, by and through her attorney, JOSHUA R. HARRIS, ESQ., and requests a THIRTY (30) calendar day extension of time, to file the **REPLY TO RESPONSE TO MOTION TO FOR REMAND**, up to and including June 20, 2019.

Plaintiff's current deadline to file the **MOTION FOR REMAND** is May 21, 2019.

The Appellate Attorney Writer has had acute incapacitating migraines preventing the completion of the Reply.

Via email on May 21, 2019, opposing counsel expressed no objection to the extension.

1 It is therefore respectfully requested that Plaintiff be granted a THIRTY (30) calendar  
2 day extension of time to file the **REPLY TO RESPONSE TO MOTION FOR REMAND** up  
3 to and including June 20, 2019.

4 DATED this 21<sup>st</sup> day of May, 2019.

5 /s/ Joshua R. Harris  
6 **JOSHUA HARRIS, ESQ.**  
7 Nevada State Bar No. 9580  
8 Richard Harris Law Firm  
9 801 S Fourth St.  
10 Las Vegas NV 89101  
11 Ph: (702) 444-4392  
12 Fax: (702) 444-4455  
13 Email: [josh@richardharrislaw.com](mailto:josh@richardharrislaw.com)  
14 Attorney for Plaintiff

DATED this 21<sup>st</sup> day of May, 2019.

5 /s/ Tina Naicker  
6 TINA NAICKER, CSBN 252766  
7 Special Assistant United States Attorney  
8 160 Spear Street, Suite 800  
9 San Francisco, California 94105  
10 Telephone: (415) 268-5611  
11 Facsimile: (415) 744-0134  
12 E-Mail: Tina.Naicker@SSA.gov  
13 Attorneys for Defendant

15 IT IS SO ORDERED:

16   
17 \_\_\_\_\_  
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: \_\_\_\_ May 22, 2019 \_\_\_\_  
20  
21  
22  
23  
24  
25  
26  
27  
28